

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF
VICTORIA DAVIS
LOCKARD, ESQ.**

VICTORIA DAVIS LOCKARD, ESQ., being of full age, certifies as follows:

1. I am a Shareholder at Greenberg Traurig, LLP, attorneys for Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis Pharma, Inc., and Actavis LLC. I make this Certification based on personal knowledge and in support of the Defendants' Joint Motion to Exclude the Opinions of Kaliopi Panagos, Pharm.D., R.Ph.

2. Attached hereto as Exhibit A is a true and accurate copy of the Expert Report of Kali Panagos, Pharm.D., R.Ph., dated November 9, 2021, with Appendices A-B, served in MDL 2875.

3. Attached hereto as Exhibit B is a true and accurate copy of the transcript of the deposition of Kali Panagos, Pharm.D., R.Ph., in MDL 2875, dated January 21, 2022.

4. Attached hereto as Exhibit C is a true and accurate copy of the article entitled “ASHP Guidelines on the Pharmacy and Therapeutics Committee and the Formulary System,” 78 Am. J. Health-Syst. Pharm. 907, dated May 15, 2021.

Dated: May 3, 2022

Respectfully submitted,

/s/ Victoria Davis Lockard

Victoria Davis Lockard
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USA, Inc., Teva Pharmaceutical
Industries, Ltd., Actavis Pharma, Inc.,
and Actavis LLC*

CERTIFICATE OF SERVICE

I, Kate Wittlake, an attorney, hereby certify that on May 3, 2022, I caused a copy of the foregoing document to be served on all counsel of record via CM/ECF.

/s/ Kate Wittlake
Kate Wittlake